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10 *Attorneys for Debtors and Reorganized Debtors*

11  
12 **UNITED STATES BANKRUPTCY COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

14  
15 **In re:**

16 **PG&E CORPORATION,**

17 **- and -**

18 **PACIFIC GAS AND ELECTRIC**  
19 **COMPANY,**

20 **Debtors.**

- 21  
22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
24  Affects both Debtors

25 \* *ALL PAPERS SHALL BE FILED IN THE*  
*LEAD CASE, NO. 19-30088 (DM)*

26 Case Nos. 19-30088 (DM)

27 (Lead Case) (Jointly Administered)

28 **DECLARATION OF ROB SULLIVAN IN  
SUPPORT OF PG&E'S MEMORANDUM  
OF POINTS AND AUTHORITIES IN  
OPPOSITION TO MOTION FOR PARTIAL  
SUMMARY JUDGMENT AND COUNTER-  
MOTION FOR SUMMARY JUDGMENT**

Date: April 11, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Rob Sullivan, declare:

2       1. I am Principal Land Surveyor for Pacific Gas and Electric Company.

3       2. I am and for over 14 years have been a licensed surveyor holding License No.  
4 8558 in the State of California. I have the qualifications and experience to review easements,  
5 rights of way and other property rights and to plot those on drawings depicting the locations and  
6 boundaries of such easements, rights of way, and other property rights.

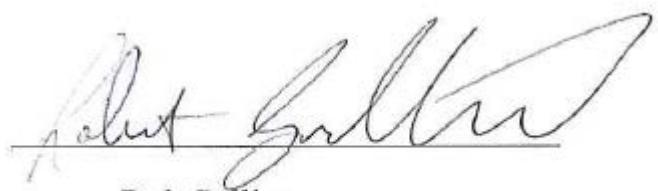
7       3. Attached hereto are true and correct copies of the following exhibits kept and  
8 maintained in the ordinary course of business by Pacific Gas and Electric Company:

- 9           a. Exh A – Easement [LD 2303-05-1151], recorded on September 12, 1923 as  
10           depicted in Volume 87 of Deeds page 328 in the San Mateo [Recording Office].
- 11           b. Exh B –Easement [LD 2304-05-0096], recorded on March 3, 1923 as depicted in  
12           Volume 68 of Deeds page 208 in the San Mateo [Recording Office].
- 13           c. Exh C – Easement [LD 2303-05-0076], recorded on May 21, 1910 as depicted in  
14           Volume 177 of Deeds page 393 in the San Mateo [Recording Office].
- 15           d. Exh D – Easement [LD 2303-05-1152], recorded on March 3, 1923 as depicted  
16           in Volume 64 of Deeds page 406 in the San Mateo [Recording Office].

17       4. Attached hereto as Exh E is a true and correct copy of a drawing created by me of APN:  
18           020-1550-030, commonly known as the Komir Property and which is the subject of the  
19           complaint in this action, which accurately depicts the recorded easements in Exhs A-D  
20           attached hereto.

21  
22           Executed at Concord, California on the 28 of February 2023.

23           I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct.



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26  
27  
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Rob Sullivan

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DECLARATION OF ROB SULLIVAN